

BCB CHEYENNE LLC d/b/a BISON
BLOCKCHAIN, a Wyoming limited liability
company,

Plaintiff,

v.

MINEONE WYOMING DATA CENTER
LLC, a Delaware limited liability company;
MINEONE PARTNERS LLC, a Delaware
limited liability company; TERRA CRYPTO
INC., a Delaware corporation; BIT ORIGIN,
LTD, a Cayman Island Company;
SONICHASH LLC, a Delaware limited
liability company; BITMAIN
TECHNOLOGIES HOLDING COMPANY, a
Cayman Island Company; BITMAIN
TECHNOLOGIES GEORGIA LIMITED, a
Georgia corporation; and JOHN DOES 1-20,
related persons and companies who control or
direct some or all of the named Defendants.

Defendants.

DEFENDANTS MINEONE WYOMING DATA CENTER LLC, MINEONE PARTNERS LLC, AND TERRA CRYPTO INC.’S REQUEST FOR EXTENSION OF TIME TO FILE MOTION TO COMPEL

COME NOW Defendants MineOne Wyoming Data Center LLC, MineOne Partners LLC, and Terra Crypto Inc. (the “MineOne Defendants”) by and through counsel, HATHAWAY & KUNZ, LLP, and LOEB & LOEB LLC, and hereby request an extension of four (4) additional days to file their motion to compel.

- 1) This Court’s September 10, 2024 Order (ECF No. 342; the “Order”) requires MineOne Defendants to file their Motion to Compel by September 16, 2024.
- 2) Since that time, circumstances have changed which necessitate an extension of time for MineOne Defendants to file their Motion to Compel.
- 3) Since the Court’s 9/10/24 Order, Plaintiff BCB has settled its claims against Defendant Bitmain Georgia Technologies Limited (“Bitmain”) and Bitmain has been dismissed from the action with prejudice. Because Plaintiff can only collect once for its damages, there are potential apportionment of liability issues and similar issues, and Bitmain representatives will likely be called to testify at trial (among other reasons), it is essential that the remaining Defendants be permitted to review the terms of BCB’s settlement agreement (and any side agreements or undisclosed insurance coverage) between BCB and Bitmain. Defendants’ counsel requested this documentation from BCB, but BCB’s counsel has refused to produce it, see Ex. A; Ex. B. This is another issue which should be included in the motion to compel so that these issues are all tied up in one motion.

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- 4) Many of the documents that BCB produced in its August 2024 document dumps (as well as earlier), which totaled a massive 27,000 pages are missing critical attachments. See, e.g., Ex. C at BCB151687, BCB151690, BCB151693, BCB151694. BCB should be directed to produce all missing attachments immediately. This issue should be briefed in the upcoming motion.
- 5) BCB's belated August 2024 document production included highly relevant videos depicting the jobsite and BCB's discussions about the construction progress. However, BCB failed to identify the date of these videos or produce the full set of metadata so that dates, authors, means of recording (among other things) could be determined. BCB must produce full and complete metadata for the videos it produced. This issue should also be briefed to keep the issues in one motion.
- 6) The MineOne Defendants respectfully request a 4-day extension until Friday, September 20, 2024, of their deadline to file their Motion to Compel. This extension is necessary in order to detail the gravity of BCB's discovery omissions and exclusions, and because the MineOne Defendants are currently preparing their opposition to BCB's motion for reconsideration, preparing for depositions, and other case related tasks.
- 7) In sum, the MineOne Defendants respectfully request a short extension of four (4) days until September 20, 2024 to file their Motion to Compel.
- 8) MineOne Defendants have attempted to confer this afternoon and have not yet received a response from Plaintiff's counsel on this motion.

WHEREFORE, the MineOne Defendants request this Court enter an order granting an extension of up to and including September 20, 2024 in which to file their Motion to Compel.

DATED this 13th day of September, 2024.

DEFENDANTS MINEONE WYOMING DATA
CENTER, LLC, MINEONE PARTNERS LLC,
AND TERRA CRYPTO INC.

By: /s/ Sean Larson

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CERTIFICATE OF SERVICE

This is to certify that on the 13th day of September, 2024, a true and correct copy of the foregoing was served upon counsel as follows:

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